



September 18, 2009

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P.O. Box 1396  
Houston, Texas 77251-1396  
713/215-2000

Mr. Chris Hoidal  
Director, Western Region  
Pipeline and Hazardous Materials Safety Administration  
12300 W. Dakota Avenue, Suite 110  
Lakewood, CO 80228

**Re: CPF 5-2009-1002M**

Dear Mr. Hoidal:

Williams received PHMSA's NOA on April 21, 2009, and on May 21, 2009, submitted a request for extension to December 21, 2009 to submit amended procedures. In an email response on July 2, 2009, you granted Williams an additional 30 days, setting the new deadline to respond to the NOA to September 21, 2009.

After reviewing each of the NOA items, it is apparent that some of the procedural issues are more significant than others. In the response we have categorized each NOA item in order of significance to ensure the severity of the deficiencies are viewed in the proper context. We appreciate the improvement opportunity the NOA items will bring to some of the operating and maintenance procedures because several of the identified items could affect performance. However, most of the NOA items are relatively less severe and present an opportunity for quality improvement.

Each response to the NOA item contains a category number, the applicable Williams' procedure number(s), and explanation of action taken. The procedures requiring amendment are also included with this letter. Below are the four action categories that classify the severity of each NOA item:

1. Procedure issue is significant and if not updated may lead to improper performance;
2. Procedure issue is relevant. Updating the procedure would improve the quality and understanding of the procedure, but has not and would not lead to improper performance;
3. Procedure issue may have been misinterpreted during the PHMSA review and is deemed adequate for compliance and performance; and,
4. Procedure issue noted in Integrated Inspection audit was addressed in 2008, prior to receiving the NOA letter. Changes to the procedure were issued in the January 2009 update of the O&M manual.

The response to each NOA item follows:

## **NOA Items and Summary of Document Revisions**

1. Related attachments: Policy 90.12.00; Procedure 90.12.01.  
Category 2  
Description of revisions:  
  
Section 1.3 of Policy 90.12.00 was revised to indicate that cracks in an in-service weld less than 8% of the total weld length may be repaired as allowed by 192.245.  
  
Section 4.3 of Procedure 90.12.01 was revised to support Policy 90.12.00 and lists the steps needed to repair cracks less than 8% of the total weld length of an in-service weld. The details are in accordance with API 1104 and 192.245 and 192.715.
2. Related attachments: Policy 20.02.00.  
Category 2  
Description of revisions:  
  
Qualification of corrosion personnel is covered in Policy 20.02.00. We believe the policy is technically adequate; however it could be improved with more specificity on the qualification requirements. The attached Policy 20.02.00 has been revised to more specifically describe the qualification requirements of personnel using as a guideline, the language used by NACE to describe the qualification.
3. Related attachments: Policy 20.03.00.  
Category 2  
Description of Revisions:  
  
Section 1.3 of Policy 20.03.00 has been revised to include the requirements for pre-71 coated pipe to be cathodically protected. The requirement for pre-1971 pipe was not specifically stated in Policy 20.03.00 but WGP has not treated pre-1971 differently than post-1971 pipe.
4. Related attachments: Policy 20.06.00.  
Category 1  
Description of Revisions:  
  
See section 1.1 of Policy 20.06.00 that was updated to address this issue.
5. Related attachments: Policy 20.06.00.  
Category 2  
Description of Revisions:  
  
See section 1.3 of Policy 20.06.00 that was updated to address this issue.
6. Related attachments: Procedure 20.09.01.  
Category 4  
Description of Revisions:  
  
The attached Procedure 20.09.01, Section 3.1.1 was updated in 2008 following the PHMSA Integrated Inspection and prior to receiving the PHMSA NOA.
7. Related attachments: Procedure 20.11.01.  
Category 2  
Description of Revisions:

See sections 6.3.2 and 7.4 of Procedure 20.11.01 that were updated to address this issue.

8. Related attachments: Procedure 90.11.01; 20.11.01.  
Category 2  
Description of Revisions:

See section 9.0 of Procedure 90.11.01 that was revised to include a requirement to inspect the ID surface of the hot tap coupon for internal corrosion. Section 6.1 of procedure 20.11.01 was revised to reference the updated requirements in Procedure 90.11.01.

9. Related attachments: Procedure 20.11.02; 20.11.01.  
Category 2  
Description of Revisions:

See section 10.5 of Procedure 20.11.01 and section 5.1.5 of procedure 20.11.02 that were updated to address these issues.

10. Related attachments: Procedure 20.13.01.  
Category 2  
Description of Revisions:

WGP believes that the PHMSA issue related to atmospheric corrosion based on the ECDA procedure is inappropriate for the referenced regulation. Procedure 20.13.01 does address remedial actions to be taken.

Regarding the issue for inspection for atmospheric corrosion under insulation, the last bullet in Section 3.2 of Procedure 20.13.01 has been updated to address the issue.

11. Related attachments: Procedure 70.04.01.  
Category 2  
Description of Revisions:

The attached Procedure 70.04.01 was updated prior to receiving the NOA in 2008 in several sections to reference the Onshore Pipeline Construction Specification (90.0500) Section 18, "Cleaning, Hydrostatic Testing, Dewatering, and Tie-In" that covers the recommendations in Advisory Bulletin ADB-04-01, "Hazards Associated with Dewatering of Pipelines". In addition and following the receipt of the NOA, the attached Procedure 70.04.01 was revised under section 3.3.11 with a caution note to further emphasize the safety requirements.

12. Related attachments: Policies 10.22.00; 15.03.00  
Category 3  
Description of Revisions: None required.

WGP believes that our current approach to using local and/or facility specific procedures meets the intent of regulations. First, it is not required nor is it practical for all procedures to be in one book called an O&M manual. As long as equipment operating procedures, control room procedures and other procedures that apply only to a specific location exist, there is no violation of the regulations. Second, the regulations at 192.15 provide rules for regulatory construction and clearly state that words importing the singular include the plural, in this case meaning that one or more "manuals" are allowed. Further, as an example the attached Policy 10.22.00 states the requirements for the development of local operational plans we believe is adequate. In addition, the attached Policy 15.03.00

states the requirements for developing start-up and shut-down procedures we believe is adequate.

13. Related attachments: None  
Category 3  
Description of Revisions: None required.

WGP believes that our current approach to using control room, local and/or facility specific procedures meets the intent of regulations. Please see the response to NOA Items 12 above that also apply to this issue. Actions required by Gas Control are included in numerous procedures within the O&M Manual where needed. In addition, a requirement for control room procedures is not referenced in 192.605.

14. Related attachments: Policy 10.02.00; Procedure 10.02.01; Northwest Pipeline Control Room Procedures  
Category 2  
Description of Revisions:

Regarding PHMSA's assessment that abnormal operations procedures are inadequate, the attached Procedure 10.02.01 addresses all necessary categories and steps for abnormal operations required by the regulations.

The Northwest Pipeline control room procedures that are needed for abnormal operations to supplement the requirements already covered in Procedure 10.02.01 are attached.

Regarding PHMSA's assessment that procedure 10.02.01 does not contain provisions for responding to, investigating and correcting the cause of abnormal operations, section 8.0 of procedure 10.02.01 has been added to reference the WGP policy 10.18.00, "Root Cause Analysis (RCA) of Pipeline or DOT Reportable Accidents and Failures" to clarify that an RCA may be needed as a result of an abnormal operation.

In addition, section 1.2 of Policy 10.02.00 and section 9.2.1 of Procedure 10.02.01 cover review and correction of deficiencies discovered as a result of abnormal operations.

15. Related attachments: Procedure 10.30.01  
Category 2  
Description of Revisions:

See section 1.2 of Policy 10.30.01 that was revised and Attachment A that identifies all shallow water pipelines subject to the procedure to address this issue. Section 6.0 of the procedure includes the requirements to inspect the shallow water pipelines.

16. Related attachments: Procedure 10.30.01  
Category 3  
Description of Revisions: None required.

WGP uses a risk algorithm that includes hurricanes as a possible driver for higher risk, which was reviewed during the Integrated Inspection. Section 4.1.3 of Procedure 10.30.01 specifically states all the risk drivers including hurricane effects and requires an annual review all risk data.

17. Related attachments: Policy 70.06.00  
Category 2  
Description of Revisions:

All of the requirements stated in 192.613 (Continuing Surveillance) are generally covered in Policy 70.06.00. The details for each required surveillance item are addressed in other, more appropriate procedures and as such specificity in this procedure is not necessary. However, section 1.3 of Policy 70.06.00 has been revised to reference other procedures that address continuing surveillance activities.

18. Related attachments: Procedure 10.17.01; 75.01.01  
Category 3  
Description of Revisions: None required.

WGP is not aware of requirements in the regulation for special processes to deal with excavators who do not comply with state requirements. In addition, section 6.2.12 of Procedure 10.17.01 does specify what to do when an excavator does not have a one-call ticket. Also, section 3.10 of Procedure 75.01.01 covers investigating encroachments, which requires contacting law enforcement if the excavator poses an immediate threat by violating applicable requirements.

19. Related attachments: Procedure 10.18.00  
Category 3  
Description of Revisions: None required.

Section 1.0 of Policy 10.18.00 specifies when root cause analysis is to be conducted.

20. Related attachments: Procedure 20.13.00; 20.13.01  
Category 2  
Description of Revisions:

Section 2.2 of Policy 20.13.00 and Section 3.0 of Procedure 20.13.01 has been revised to clarify identification and documentation requirements for exposed pipelines.

21. Related attachments: Procedure 70.12.00; 70.12.01  
Category 2  
Description of Revisions:

Section 1.1 of Policy 70.12.00 specifically states the requirement for markers at crossing or roads and railroads. Section 3.4 of Procedure 70.12.01 has been revised to further clarify the requirements, as appropriate.

22. Related attachments: Procedure 70.14.01  
Category 2  
Description of Revisions:

Section 4.1.5.3 and Figure 2 of Procedure 70.14.01 have been revised to address the issue.

23. Related attachments: Procedure 60.02.00  
Category 3  
Description of Revisions: None required.

Section 1.3 of Policy 60.02.00 specifically states that if a relief device does not have sufficient capacity it must be promptly replaced.

24. Related attachments: Policy 70.16.00  
Category 4  
Description of Revisions:

Section 1.2.1 of the attached Policy 70.16.00 was updated in 2008 following the PHMSA Integrated Inspection and prior to receiving the PHMSA NOA to address the issue.

25. Related attachments: Policy 10.09.01  
Category 2  
Description of Revisions:

Section 4.1.4.1 of Policy 10.09.01 has been revised to address the issue.

26. Related attachments: Policy 10.24.00  
Category 2  
Description of Revisions:

See section 1.5 of Policy 10.24.00 that has been updated to address supervisor qualifications.

27. Related attachments: WGP ILI Specification  
Category 2  
Description of Revisions:

See attached section 3 of the WGP Inline Inspection Specification that has been updated to address the issue.

28. Related attachments: 70.18.01  
Category 1  
Description of Revisions:

See section 6.1.3.1 of Procedure 70.18.01 that shows the revised significant cracking definition.

Regarding the field records reviewed for Snohomish Compressor Station decisive action was taken. The integrity specialist performed magnetic particle inspection (MPI) on each ILI excavation on the 30" line from Mt Vernon to Snohomish C/S's. In the case cited in the NOA, the less than 10% thru-wall thickness indications were buffed out. Of the 120+ excavations to-date, all of which have been MPI'd, this was the only inspection resulting in crack-like indications. In the future, each ILI excavation will employ MPI to continue this ongoing evaluation. The cited case was reviewed extensively with PHMSA representatives (Kuang Chu and Huy Nguyen) in the 1<sup>st</sup> Qtr 2009 during a detailed meeting near SEATAC. In addition, this issue was discussed during the recent WUTC audit of Sumas District later in 2009. In neither case was further follow-up requested.

29. Related attachments: 70.14.01; 70.17.01  
Category 1  
Description of Revisions:

See section 3.1.6 of Procedure 70.14.01 that has been updated to address the issue.

See Figure 9 and Figure 10 in Procedure 70.17.01 that has been updated to address the issue.

30. Related attachments: 70.14.01; 70.17.01  
Category 1  
Description of Revisions:

See Figure 11 added to Procedure 70.17.01 that shows work flow for Immediate Crack-like Indications.

See Figure 4 that addresses the 80% wall loss issue.

See Figure 10 that addresses work flow for Immediate Dent Anomalies.

See Figures 2 (Evaluating dents that do not contain gouges) and Figure 3 (Evaluating dents that contain gouges or scratches) in Procedure 70.14.01 to address the dent issue.

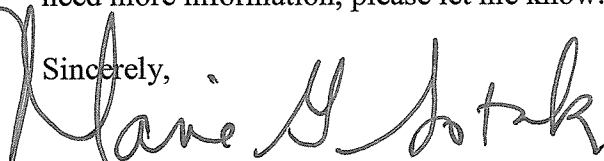
31. Related attachments: Procedures 10.25.01: 20.11.01  
Category 2  
Description of Revisions:

WGP revised procedure 10.25.01 in 2008 following the Integrated Inspection and prior to the receipt of the NOA to address the requirement of section 192.935. The procedure now requires that "the Threat Checklists provide guidelines on interactive threats where appropriate for the specific threats and specify the required assessment methods and preventive and mitigative measures (PMM) to address the threats identified." (Section 7.1.1.2) The procedure also requires that by November 1 of each year, SMEs shall complete the Threat Checklists, which includes PMM, for pipeline segments. (Section 8.1.1). Also added to the procedure is the requirement to add additional PMM to the Integrity Assessment and Mitigation Plans for pipeline segments. (Section 8.1.1.3.1)

Section 7.1.2 of Procedure 20.11.01 was revised to include analyzing fluids/solids obtained at pig receivers, pipe change outs or other locations, specifically in HCAs where internal fluids/solids are not regularly scheduled to be sampled as an additional PMM.

We hope the above response addresses the NOA requirements. If you have questions or need more information, please let me know.

Sincerely,



Marie G. Sotak  
Manager of Pipeline Safety  
Williams Gas Pipelines

Enclosures